

Putting high level wide band signals on an unshielded, unbalanced, very long elevated conductors throughout the nation would be extremely disruptive to many existing users of HF.

In other countries where BPL (or Access PLC) has been tried, harmful interference to Commercial, Military and Amateur use of the affected HF Spectrum has been altogether excessive.

Usable PLC signal levels will produce field strengths that render the spectrum unusable except for very limited, short range use.

15.31(f)(2) permitting extrapolation of field strength at 40dB/Decade is not useful when considering near field, large source emitters. Actual experience of field strengths are much higher than predictions under that rule.

Some partial relief could be had by notching out selected frequencies, but that does not help any other users without the political power or technical expertise to protect their spectrum.

The desire to provide competitive broadband connectivity to America is commendable, but this method is simply not viable in the real world.

Broadband signals belong on Fiber, Coax, carefully balanced lines, or on well designed RF systems that will not cause interference to others.